

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK  
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-LO-TCB

**NOTICE OF FILING OF DEFENDANTS' MOTION TO SEAL**

PLEASE TAKE NOTICE that pursuant to Local Civil Rule 5, Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. (collectively "Defendants"), by counsel and in accordance with the Stipulated Protective Order entered in this matter on August 18, 2016 (Dkt. 45) hereby gives public notice that a Motion to Seal was filed on September 17, 2021 to respectfully move this Court for entry of an Order directing that Exhibits 3, 4, and 5 to Defendants' Reply in support of their Supplemental Memorandum Pursuant to the Court's July 28, 2021 Order be sealed. Defendants' Motion to Seal respectfully moves the Court to seal the following:

- Exhibit 3: Confidential excerpts from the deposition transcript of Josephine Giambanco.
- Exhibit 4: Confidential excerpts from the deposition transcript of Carolina Easton.
- Exhibit 5: Confidential excerpts from the deposition transcript of Defendants' designated Rule 30(b)(6) witness.

Defendants' Motion to Seal was filed on September 17, 2021 and memoranda in support of or in opposition to the motion must be filed within seven (7) days after the filing of

Defendants' Motion to Seal, and all or part of such memoranda may be designated as confidential. Further, any person objecting to the motion must file an objection with the Clerk within seven (7) days after the filing of the Defendants' Motion to Seal and if no objection is filed in a timely manner, the Court may treat the motion as uncontested.

Dated: September 17, 2021

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP, WAPLES PROJECT LIMITED  
PARTNERSHIP AND  
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

---

Michael S. Dingman (VSB No. 30031)  
McGuireWoods LLP  
1750 Tysons Boulevard  
Suite 1800  
Tysons, VA 22102  
(703) 712-5462  
(703) 712-5262  
mdingman@mcguirewoods.com

Grayson P. Hanes (VSB No. 06614)  
Justin deBettencourt (VSB No. 83806)  
REED SMITH LLP  
7900 Tysons One Place  
Suite 500  
McLean, Virginia 22102  
(703) 641-4200 (Telephone)  
(703) 641-4340 (Facsimile)  
ghanes@reedsmith.com  
jdebettencourt@reedsmith.com

*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 17th day of September, 2021, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

---

Michael S. Dingman (VSB No. 30031)  
McGuireWoods LLP  
1750 Tysons Boulevard  
Suite 1800  
Tysons, VA 22102  
(703) 712-5462  
(703) 712-5262  
mdingman@mcguirewoods.com

Grayson P. Hanes (VSB No. 06614)  
Justin deBettencourt (VSB No. 83806)  
REED SMITH LLP  
7900 Tysons One Place  
Suite 500  
McLean, Virginia 22102  
(703) 641-4200 (Telephone)  
(703) 641-4340 (Facsimile)  
ghanes@reedsmith.com  
jdebettencourt@reedsmith.com

*Counsel for Defendants*